8 September, 2005

<u>VIA ECFS</u>
Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C.   20554

Re: *Ex Parte* Communications in MM Docket 99-325

Dear Ms. Dortch:

This is to notify you that on 7 September 2005, the undersigned met with the following individuals in four separate meetings: Lauren Belvin, Legal Adviser to Commissioner Kathleen Abernathy; Catherine Bohigian, Senior Legal Advisor to Chairman Kevin Martin; Rudy Brioche, Legal Advisor to Commissioner Jonathan Adelstein; and Jordan Goldstein, Senior Legal Advisor to Commissioner Michael Copps.

In each case, the meeting pertained to MM Docket No. 99-325, *Digital Audio Broadcasting Systems And Their Impact On the Terrestrial Radio Broadcast Service.* We discussed IBOC multicasting, FM extended hybrid, AM nighttime operation, AM digital interference, datacasting, ownership rules, and public interest obligations.

In addition, the undersigned provided the attached Supplemental Written Comments to some individuals.

This letter is being provided to your office in accordance with Section 1.1206 of the Federal Communications Commission rules.   A copy of this letter has been delivered by e-mail to the meeting participants.

Respectfully submitted,

Michael Bergman
Vice President, New Digital Technologies

cc: Lauren Belvin
        Catherine Bohigian

Rudy Brioché
Jordan Goldstein

Supplemental Written Comments

Multicasting is very cheap to implement.   On the receiver side, it comes with all new IBOC (HD Radio) products, free.   There is no additional hardware or software cost, so receiver makers are beginning to convert products over.

But more importantly, the transmit side conversion—from IBOC to IBOC plus multicasting—is relatively inexpensive.   A station can convert for approximately $10K to $30K, according to our information from equipment makers and broadcast groups.

This isn't a trivial amount of money, but it is a low bar compared to putting up another local station. We expect many smaller stations and groups to convert to MC quickly, just as the larger groups are converting.   We expect a great deal of locally-produced content from smaller groups, as a result.